

Troy Rawlings, 6969  
Davis County Attorney's Office  
P. O. Box 618  
800 West State Street  
Farmington UT 84025  
Telephone: (801) 451-4300  
FAX: (801) 451-4328

---

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
IN AND FOR THE COUNTY OF DAVIS, STATE OF UTAH

---

THE STATE OF UTAH  
Plaintiff,  
vs.

EDWARD LEWIS OWENS  
Defendant.

STATE'S RESPONSE TO MOTION TO USE  
VARIOUS STATEMENTS & EVIDENCE  
FOUND IN POLICE INVESTIGATIVE FILE

Case No. 081701234  
Judge: John R. Morris

---

The State of Utah, by and through Davis County Attorney Troy S. Rawlings, hereby responds to the defendant's motion in limine related to the defendant's possible use of "Various Statements & Evidence Found in Police Investigative File" as follows:

1. If the defendant seeks to admit police reports, the whole and complete entirety of such reports must come in so the jury has the complete context of any particular statement. The defendant should not be able to selectively choose which portions are admitted and which are not. The State of Utah will stipulate to the defendant's request to the use of reports on such a basis. To do otherwise would deny the State of Utah the right to a fair trial.

WHEREFORE, the State of Utah respectfully requests that this court allow the defendant's motion to the extent that all reports are admitted in their entirety

without selective editing by the defense.

DATED June 16, 2014

---

Troy Rawlings

CERTIFICATE OF MAILING/DELIVERY

I certify that I faxed/mailed/delivered a copy of the foregoing State's Response to Motion to use Various Statements and Evidence Found in Police Investigative File to Michael Studebaker, Attorney for Defendant, on June 16, 2014.

---